

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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Southern California Edison Company's  
Application For Approval of Embedded  
Energy Efficiency Pilot Programs for 2007-  
2008.

Application 07-01-024

Application of Pacific Gas and Electric  
Company Seeking Approval of Water-  
Embedded Energy Savings Pilot Program.

Application 07-01-026

San Diego Gas and Electric Company for  
Approval of Energy & Water Efficiency  
Partnership and Budget for Years 2007  
Through 2008.

Application 07-01-029  
(Filed January 16, 2007)

Southern California Gas Company for  
Approval of Energy & Water Efficiency  
Partnership and Budget for Years 2007  
Through 2008.

Application 07-01-030  
(Filed January 16, 2007)

**REPLY OF PACIFIC GAS AND ELECTRIC COMPANY  
TO COMMENTS OF THE UTILITY REFORM NETWORK  
AND THE DIVISION OF RATEPAYER ADVOCATES ON  
ITS SUPPLEMENTAL AND ADDITIONAL  
SUPPLEMENTAL TESTIMONY REGARDING  
APPROVAL OF WATER-EMBEDDED ENERGY  
SAVINGS PILOT PROGRAM**

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OF THE STATE OF CALIFORNIA**

Southern California Edison Company's Application For Approval of Embedded Energy Efficiency Pilot Programs for 2007-2008.	Application 07-01-024 (Filed January 16, 2007)
Application of Pacific Gas and Electric Company Seeking Approval of Water-Embedded Energy Savings Pilot Program.	Application 07-01-026 (Filed January 16, 2007)
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SAVINGS PILOT PROGRAM**

**I. INTRODUCTION**

In accordance with the June 22, 2007 e-mail notice from Administrative Law Judge Weissman extending the time schedule in this matter, Pacific Gas and Electric Company ("PG&E") hereby submits this Reply to Comments on both the Supplemental and the Additional Supplemental Testimony of PG&E for Approval of the Water-Embedded Energy Savings Pilot Program. PG&E received Comments from the Natural Resources Defense Council ("NRDC") and joint Comments from The Utility Reform Network ("TURN") and the Division of Ratepayer

Advocates (“DRA”).

The Comments from NRDC are supportive of the proposed pilot program. TURN and DRA “support ratepayer funding of PG&E’s proposed pilot activities” (page 5) and make recommendations that they believe would further enhance the program (page 26). PG&E appreciates the support of NRDC, TURN and DRA for the proposed pilot programs. PG&E is pleased that the parties have reached agreement on most major issues. However, PG&E does not believe that the California Public Utilities Commission (“Commission”) should adopt all of the recommendations of TURN and DRA, as discussed below.

**II. CERTAIN OF TURN AND DRA’S RECOMMENDATIONS ARE INCONSISTENT WITH THE DESIGN FOR PG&E’S LOW INCOME HIGH EFFICIENCY TOILET REPLACEMENT PILOT AND SHOULD BE REJECTED.**

**A. TURN and DRA’s Recommendation to Include San Francisco Homes in PG&E’s Pilot Should be Rejected as it Would Require Significant Re-Design of the Program, Increase Ratepayer Costs, and Not Save Significant Energy.**

PG&E does not agree with TURN and DRA’s suggestion to include San Francisco in its low income high efficiency toilet (“HET”) replacement program for several reasons.

First, TURN and DRA incorrectly assume that PG&E is drawing a random sample for the toilet installation. PG&E does not propose to draw a random sample for this program. Rather, the pilot will coordinate with the existing Low Income Energy Efficiency (“LIEE”) program to offer an HET to the first 3,000 qualifying PG&E LIEE customers in the territory of the Santa Clara Valley Water District (“SCVWD”). Pilot participants will be required to be customers of both PG&E and SCVWD in order to qualify to participate in the pilot. LIEE energy specialists who perform the LIEE program’s upfront measure assessments will verify that a Santa Clara County LIEE participant is a SCVWD customer who qualifies for HET replacement at the same time as they are income-qualifying the customer and assessing the customer’s home for all the

LIEE measures and services for which the customer may qualify.

Second, a random sampling technique including San Francisco customers would add significant costs to the pilot without securing significant additional benefits. While no funding for HETs will come from the LIEE program, the pilot as designed by PG&E will take advantage of the LIEE program's process and infrastructure at no additional cost, thus keeping the administrative costs for the pilot as low as possible, and making the pilot measure as cost-effective as possible. Offering HETs to a random sample of low income customers would not allow PG&E to coordinate the pilot within the existing LIEE structure, and the pilot would essentially become a more expensive stand-alone program requiring additional funding for assessment, income-verification, scheduling, tracking, etc., none of which is required when it is incorporated as part of the existing LIEE program.

Third, San Francisco is not within the territory of SCVWD, and thus residents within San Francisco would not be eligible for the SCVWD rebate. Nor is San Francisco within the territory of any of the water agencies with whom PG&E is partnering, thus making its residents ineligible for pilot activities.

Fourth, San Francisco's water system is nearly entirely gravity-fed, making it among the least, if not the least, energy-intensive water systems in the state. A toilet program in San Francisco would not save a significant amount of energy.

**B. PG&E's Revised Proposal to Replace 3,000 Toilets More Closely Mirrors Within the Water Energy Pilot the Ratio of LIEE Budget to the Overall PG&E Energy Efficiency Portfolio.**

TURN and DRA state that PG&E's rationale for the reduction to 3,000 toilets remains unclear (page 8) and that the budget may still be too large for the needs of the pilot (page 9). PG&E revised its proposal from 4,200 toilet replacements down to 3,000 to more closely match within the pilot the ratio that the LIEE budget bears to the overall PG&E Energy Efficiency

(“EE”) budget, pursuant to the agreement reached with TURN and DRA and the other utilities. Eliminating the 1,200 toilets planned for the Sonoma County Water Agency territory brought the ratio of the low income component of the pilot to the entire budget for the pilot to 24%. This reduction means the low income component ratio of the pilot is now similar to the 25% low income ratio for the EE portfolio budget overall.

TURN and DRA incorrectly identify the ratio of low income budget to total EE budget for PG&E as 9.4% (footnote 12, page 9). They arrive at that figure by comparing **one** year of LIEE funding to **three** years of the overall EE budget. However, comparing three years of LIEE funding to the three-year EE budget produces a ratio of 25%.

**C. Utilities Should Have Latitude to Include Single- and Multi-Family Homes in the LIHET Program.**

TURN and DRA suggest that the Commission ensure the HETs are installed in homes served directly by energy and water utilities where possible and that pilot activities installing HETs in multi-family homes be renamed. PG&E supports the ability of utilities to involve qualifying multi-family residences in the low income aspects of the pilot, especially because it may be difficult or more costly to qualify enough single family residences to meet the goals of the pilot. The Commission should avoid micromanaging program details.

**III. TURN AND DRA’S RECOMMENDATION TO COMMIT ADDITIONAL FUNDS TO THE PILOT SHOULD BE REJECTED.**

TURN and DRA recommend that the full \$10 million originally proposed be spent on the pilot. PG&E designed the most cost-effective pilot program possible. The total cost for that program is \$2.1 million. The Commission should not dedicate additional ratepayer dollars to the pilot in the absence of a clear plan for such expenditures, which TURN and DRA do not provide.

**IV. THE COMMISSION SHOULD COUNT WATER-EMBEDDED ENERGY SAVINGS TOWARDS THE UTILITIES' EE GOALS.**

TURN and DRA recommend that energy savings that may be realized through the pilot not count towards meeting utility EE goals. PG&E disagrees. The funds for the pilot would otherwise support activities that would secure savings that would count toward the utilities' EE goals. In addition, the utilities have provided the best available estimates for cost-effectiveness. A rigorous EMV plan has been developed, and the estimated savings will be verified. PG&E supports the goals of the pilot and believes that the pilot will help reduce greenhouse gas emissions and save both water and energy. For these reasons, the Commission should allow the embedded energy savings to count toward EE goals.

**V. THE COMMISSION SHOULD RESOLVE EMV ISSUES BEFORE PILOT IMPLEMENTATION BEGINS.**

PG&E requests that the Commission clarify issues around EMV before the pilots begin, so that EMV needs may be incorporated into implementation plans and activities. Uncertainties about the pilot EMV plans and administration could hamper effective EMV activities.

Respectfully Submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **“REPLY OF PACIFIC GAS AND ELECTRIC COMPANY TO COMMENTS OF THE UTILITY REFORM NETWORK AND THE DIVISION OF RATEPAYER ADVOCATES ON ITS SUPPLEMENTAL AND ADDITIONAL SUPPLEMENTAL TESTIMONY REGARDING APPROVAL OF WATER-EMBEDDED ENERGY SAVINGS PILOT PROGRAM”** on all known parties to A.07-01-024 et al by

- transmitting an e-mail message with the document attached to each party on the official service list providing an email address; or
- by first-class mail, postage prepaid, to each party on the official service list not providing an email address.

Executed on July 25, 2007, at San Francisco, California.

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[A0701024, -026, -029, -030]

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Commissioner Assigned: Dian Grueneich on January 19, 2007

ALJ Assigned: Steven A. Weissman on January 19, 2007

**CPUC DOCKET NO. A0701024 A0701026 A0701029 A0701030**

Southern California Edison Company's Application For Approval of Embedded Energy Efficiency Water Pilot Programs for 2007-2008.	A.07-01-024  A.07-01-026 A.07-01-029 A.07-01-030
And Related Matters.	

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